

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE <u>et al</u>)	
)	
Plaintiffs,)	
)	
v.)	<u>Case 3:17-cv-601-MHL</u>
)	
)	
JASON GOODMAN <u>et al</u>)	
)	
Defendants.)	
)	

**PLAINTIFFS' REVISED MOTION FOR ENTRY
OF A PROTECTIVE ORDER**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Local Civil Rule 7 and the Court’ Order [ECF No. 158], respectfully move the Court to enter a Protective Order.

A proposed Protective Order agreed to by Plaintiffs and Defendant Negron is attached hereto as Exhibit “A”.

The arguments and legal bases for this motion are stated more fully in Plaintiffs’ Memorandum in Support, being filed contemporaneously with this motion.

CERTIFICATION

In accordance with Local Civil Rule 37(E), Counsel for Plaintiffs, Counsel for Defendant Negron and Defendant Goodman *pro se* have conferred in good faith. Counsel for Defendant Negron approves the form of the Protective Order attached to this motion, and does not oppose this motion.

Defendant Goodman has requested additions to the Protective Order. Plaintiffs and Defendant Negron do not agree to include those additions.

REQUEST FOR RELIEF

For the reasons stated above, Plaintiffs respectfully request the Court to grant their revised motion, and enter the attached Protective Order.

DATED: August 7, 2019

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

By: /s/Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

By: /s/Steven S. Biss
Steven S. Biss (VSB # 32972)
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Telephone: (804) 501-8272
Facsimile: (202) 318-4098
Email: stevenbiss@earthlink.net

Counsel for the Plaintiffs